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Attorney for Debtors

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF UTAH

In re:	:	
	:	
GUILLERMINA SALAZAR,	:	Bankruptcy Number: 16-29028
Debtor.	:	Chapter 7
	:	
	:	
EDUARDO VALADEZ,	:	Adversary Proceeding No. 17-02005
	:	Honorable Kevin R. Anderson
Plaintiff,	:	
vs.	:	
	:	
GUILLERMINA SALAZAR,	:	
Defendant.	:	

MOTION TO WITHDRAW AS COUNSEL

1. Pursuant to Local Rule 2091-2, Tessa M. Santiago, Andrew T. Curtis and Lincoln Law Center, LLC (“Counsel”), hereby moves to withdraw as counsel for:

- a. Client Name: Guillermina Salazar
- b. Address: 340 W 920 S, #31, Provo Utah 84601
- c. Telephone Number: (801) 687-1089
- d. Email Address: salazarguillermina29@yahoo.com

2. The reason for withdrawal is as follows:

- a. On October 12, 2016, Counsel prepared and filed a Chapter 7 bankruptcy petition

for the Defendant.

b. On January 18, 2017, the present adversary proceeding was filed, and the Defendant entered into a fee agreement with Counsel for her continued representation and defense.

c. Counsel has zealously represented the Defendant.

d. The Defendant is unable to keep her obligations under the fee agreement. The Defendant contracted to make payments in return for the defense against the Plaintiff's claims. The Defendant failed to make the agreed upon payments. Counsel has incurred a substantial amount of legal fees that remain unpaid. The Defendant prefers to retain different counsel rather than to bring herself current.

3. In the event this motion is granted, Client or new counsel for Client (including new counsel in the withdrawing attorney's law firm), must file a notice of appearance within 21 days after entry of the order, unless otherwise ordered by the court. Pursuant to Local Rule 9011-2(a), no corporation, association, partnership, limited liability company or other artificial entity may appear pro se but must be represented by an attorney who is admitted to practice in this court.

4. This motion is made without the Client's consent and is accompanied by certification that Client has been served with (i) a copy of this motion, (ii) the attached written description of the status of the case, including the dates and times of any scheduled court proceedings, pending compliance with any existing court orders, and the possibility of sanctions.

5. The undersigned certifies there are no pending motions or trial.

CERTIFICATION

Counsel hereby certifies that a copy of this Motion for Withdrawal of Counsel has been sent to the Client at the address indicated above.

DATED: June 28, 2018.

/s/ Tessa Meyer Santiago

Tessa Meyer Santiago
LINCOLN LAW CENTER, LLC

/s/ Andrew T. Curtis

Andrew T. Curtis
LINCOLN LAW CENTER, LLC

STATUS OF THE CASE

Counsel hereby certifies that the following is an accurate description of the case status:

1. Debtor / Defendant is in an open adversary proceeding to determine the dischargeability of the debt owed to EDUARDO VALADEZ
2. Counsel does not believe there are any matters or motions pending
3. Counsel believes that Debtor / Defendant is in compliance with all existing court orders
4. A deadline of June 29, 2018 exists to submit a Final Pretrial Order; of which Counsel will seek continuance
5. Counsel does not believe there is a possibility of sanctions in this case

CERTIFICATION

Counsel certifies that the Debtor has read and understands Local Rule 9011-2(b). Counsel certifies that Debtor is prepared for trial as scheduled.

Local Rule 9011-2(b): Rules and Standards Applicable to Individuals Appearing Without an Attorney. An individual appearing without an attorney will be expected to be familiar with and must comply with (A) these Local Rules; (B) unless otherwise provided, the Utah Rules of Professional Conduct as reviewed and amended; (C) appropriate federal rules and statutes that

govern the action in which such individual is involved; and (D) the decisions of this court interpreting those rules and standards. Failure to comply with this rule may be grounds for dismissal of a case or proceeding, conversion of a case, appointment of a trust or examiner, judgment by default, or other appropriate sanctions.

DATED: June 28, 2018.

/s/ Tessa Meyer Santiago

Tessa Meyer Santiago
LINCOLN LAW CENTER, LLC

/s/ Andrew T. Curtis

Andrew T. Curtis
LINCOLN LAW CENTER, LLC